

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: CASE NO. 19-06480

Mary A. Jones; CHAPTER 13

Debtor(s). JUDGE Jack B. Schmetterer

OBJECTION TO CONFIRMATION OF PLAN FILED MARCH 11, 2019

WILMINGTON SAVINGS FUND SOCIETY, FSB, AS OWNER TRUSTEE OF THE RESIDENTIAL CREDIT OPPORTUNITIES TRUST V-B, hereinafter referred to as "Creditor", by and through its attorneys, ANSELMO LINDBERG & ASSOCIATES LLC, objects to the confirmation of the Chapter 13 plan for the following reasons:

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and the general orders of the Northern District of Illinois.
2. Venue is fixed in this Court pursuant to 28 U.S.C. § 1409.
3. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(L).
4. The debtor filed a petition for relief under Chapter 13 on March 11, 2019.
5. WILMINGTON SAVINGS FUND SOCIETY, FSB, AS OWNER TRUSTEE OF THE RESIDENTIAL CREDIT OPPORTUNITIES TRUST V-B holds a mortgage secured by a lien on debtor's real estate commonly known as 9142 South May Street, Chicago, Illinois 60620.
6. The creditor will be filing a claim for pre-petition arrears estimated to be \$38,235.09.
7. The Chapter 13 plan provides that the Debtor will pay WILMINGTON SAVINGS FUND SOCIETY, FSB, AS OWNER TRUSTEE OF THE RESIDENTIAL CREDIT OPPORTUNITIES TRUST V-B arrears of \$10,000.00.
8. The Chapter 13 plan provides that the debtor will make post-petition payments in the amount of \$1,000.00 directly to the Creditor. However, the correct post-petition payment amount is \$1,075.56.
9. The Chapter 13 plan does not provide for the correct creditor name. The correct creditor on said lien is WILMINGTON SAVINGS FUND SOCIETY, FSB, AS OWNER TRUSTEE OF THE RESIDENTIAL CREDIT OPPORTUNITIES TRUST V-B.
10. The Chapter 13 plan is not feasible as it will not complete within 5 years. Therefore, the plan does not comply with the requirements of 11 U.S.C. §1322(d).

11. The Chapter 13 plan does not provide that the Creditor will be paid its secured claim of \$38,235.09. Therefore, the plan does not comply with 11 U.S.C. § 1325(a)(5)(B).

WHEREFORE, Creditor prays for an entry of the attached Order Denying Confirmation of the Chapter 13 plan.

WILMINGTON SAVINGS FUND SOCIETY,
FSB, AS OWNER TRUSTEE OF THE
RESIDENTIAL CREDIT OPPORTUNITIES
TRUST V-B
/s/ Nisha B. Parikh

Anselmo Lindberg & Associates
1771 W. Diehl Rd., Ste. 120, Naperville, IL 60563-4947
630-453-6960 | 866-402-8661 | 630-428-4620 (fax)
bankruptcy@AnselmoLindberg.com
Firm File Number: B19030068
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